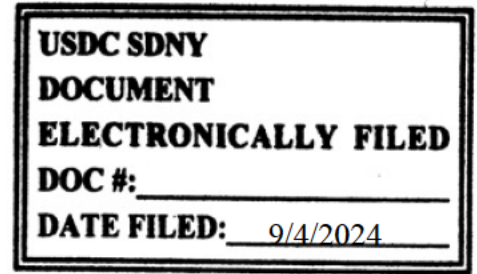




99 PARK AVENUE NEW YORK, NY 10016-1601  
TEL: (212) 286-8585 FAX: (212) 490-8966  
WWW.HPMB.COM



Gabrielle Apfel  
Associate  
gapfel@hpmb.com

September 3, 2024

**VIA ECF**

Honorable Margaret M. Garnett  
United States District Court Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Re: Royce Corley v. Rantab Enterprises Incorporated, et al.  
24-CV-0528 (MMG)(KHP)

Dear Judge Garnett:

We represent Defendants Mount Sinai Morningside and Anjali Singh, M.D. in this matter. We will represent Christina Liu, M.D. if and when she is served.<sup>1</sup>

Our law firm respectfully submits this letter motion to request a stay of Your Honor's Order, dated August 5, 2024, which instructs our law firm to conduct an additional 60 days of investigation into the identity of the Jane Doe Mount Sinai administrator or employee and file a letter with the Court by October 4, 2024 regarding the actions taken and information uncovered. (ECF 42). As the Court is aware, our law firm filed a pre-answer motion to dismiss the Complaint on both substantive and statute of limitations grounds. (ECF 38-40). Should Your Honor grant Defendants' motion to dismiss the Complaint as time-barred, any claims against the Jane Doe Mount Sinai administrator/employee would also be time-barred, rendering any information pertaining to the identity of this individual moot.

Based on the foregoing, we request that Your Honor's Order be stayed until a decision is made regarding the timeliness of plaintiff's Complaint. We thank the Court for considering our request.

Very truly yours,

Gabrielle Apfel

GA/ja

<sup>1</sup> We have been advised that, to date, Christina Liu, M.D. has not yet been served.  
2951983.1

Honorable Margaret M. Garnett  
Re: Rochelle Evelyn, et al. v. Rantab Enterprises Incorporated, et al.  
September 3, 2024  
Page 2

TO: **VIA CERTIFIED MAIL**

Royce Corley  
Plaintiff *Pro Se*  
1207 Delaware Avenue  
Suite 1619  
Wilmington, Delaware 19806

**VIA ECF**

NYC Law Department  
Assistant Corporation Counsel  
Special Federal Litigation Division  
*Attorneys for The City of New York*  
100 Church Street  
New York, NY 10007

GRANTED. The Mount Sinai Morningside Defendants' deadline to provide an update to the Court regarding their remaining *Valentin* investigations is hereby STAYED pending the Court's resolution of the statute of limitations issue in this matter, as discussed in the Court's Order at Dkt. No. 48.

SO ORDERED. Dated September 4, 2024.



HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE